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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

SYNOPSYS, INC.,) Case No. C03-02289 MJJ
)
Plaintiff,) STATEMENT IN SUPPORT OF NOTICE
) OF RELATED CASE
vs.)
)
RICOH COMPANY, LTD.,)
)
Defendant.)
)
)

Pursuant to Civil Local Rule 3-12(d), plaintiff Synopsys, Inc. ("Synopsys") hereby responds to defendant Ricoh Company, Ltd.'s ("Ricoh") Notice of Related Case filed on October 20, 2003, as follows:

Synopsys believes that two cases are currently pending in the Northern District of California that meet the definition of related case as described in L.R. 3-12(b)(1); *Synopsys, Inc. v. Ricoh Company, Ltd.*, Case No. C 03-02289 MJJ, filed May 15, 2003 and currently pending before Judge Jenkins, and *Ricoh Company, Ltd. v. Aeroflex Inc., et al.*, Case No. C 03-4669 PVT, transferred from the District of Delaware on August 29, 2003 and docketed into the Northern District of California on October 16, 2003 and currently pending before Magistrate Judge Trumbull.

Synopsys believes that these two cases are related as described in L.R. 3-12(b)(1) because both concern substantially similar factual and legal issues. Specifically, both cases have at their core the

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1 factual and legal issues regarding whether the claims in Ricoh's U.S. Patent No. 4,922,432 are valid
2 and whether the ordinary use of Synopsys' Design Compiler software infringes the claims in that
3 patent. Resolution of these issues in the present action will resolve those same core issues in the
4 related case brought against six of Synopsys' customers for their use of Design Compiler software in
5 the related case *Ricoh Company, Ltd. v. Aeroflex Inc., et al.*, Case No. C 03-4669 PVT.

6 Given that the core issues in the case against Synopsys' customers will be resolved in the
7 present action, "there will be an unduly burdensome duplication of labor and expense or conflicting
8 results if the cases are conducted before different judges," and "assignment to a single Judge is likely
9 to conserve judicial resources and promote an efficient determination of the actions." L.R. 3-12(b)(2),
10 3-12(c)(3).

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12 Dated: October 21, 2003

Respectfully submitted,

13 HOWREY SIMON ARNOLD & WHITE, LLP
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15 By: /s/ Thomas C. Mavrakakis
16 Thomas C. Mavrakakis
17 Attorneys for Defendants
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